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13	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION			
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16	SONOS, INC.,	Case No. 3:20-cv-06754-WHA		
17	Plaintiff,	Consolidated with Case No. 3:21-cv-07559-WHA		
18	VS.			
19	GOOGLE LLC,	DECLARATION OF JOCELYN MA IN SUPPORT OF SONOS, INC.'S		
20	Defendant.	ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER		
21		PARTY'S MATERIAL SHOULD BE SEALED (DKT. 728)		
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CASE No. 3:20-cv-06754-WHA

DECLARATION OF JOCELYN MA

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I, Jocelyn Ma, declare and state as follows:

- I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC ("Google") in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.
- 2. I make this declaration in support of Sonos, Inc.'s ("Sonos") Administrative Motion to Consider Whether Another Party's Material Should Be Sealed ("Administrative Motion") (Dkt. 728) filed in connection with Sonos's Proffer Re Revenue Associated with Accused Products ("Proffer") (Dkt. 727). If called as a witness, I could and would testify competently to the information contained herein.
 - 3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Exhibit A to Caridis Declaration in Support of Sonos's Proffer	Entire document	Entire document	Google
Exhibit B to Caridis Declaration in Support of Sonos's Proffer	Entire document	Entire document	Google

4. I understand that this Court has analyzed sealing requests in connection with evidentiary matters pursuant to the "good cause" standard for non-dispositive motions. See, e.g., Gearsource Holdings, LLC v. Google LLC, No. 18-CV-03812-HSG, 2021 WL 1123630, at *2 (N.D. Cal. Feb. 24, 2021) ("Because Defendant's motion in limine is not a dispositive motion, the Court applies the lower good cause standard."); Racies v. Quincy Bioscience, LLC, No. 15-CV-00292-HSG, 2019 WL 8438448, at *1 (N.D. Cal. Dec. 16, 2019) ("Because the parties move to file documents related to their motions in limine, the Court will apply the lower good cause standard."); TVIIM, LLC v. McAfee, Inc., No. 13-CV-04545-HSG, 2015 WL 3776424, at *2 (N.D. Cal. June 16, 2015) ("Because motions in limine are nondispositive motions, the Court applies the 'good cause' standard

1	to the pending motions to seal."). I also understand that material that is confidential and could harm a
2	litigant's competitive standing if disclosed may be sealed under the good cause standard. See, e.g.,
3	Skillz Platform Inc. v. AviaGames Inc., No. 21-CV-02436-BLF, 2022 WL 875654, at *2 (N.D. Cal.
4	Mar. 24, 2022) (finding "good cause to file the documents and portions of documents at issue under
5	seal given the sensitive financial and business information they contain"); Dugan v. Lloyds TSB Bank,
6	PLC, No. 12-CV-02549-WHA NJV, 2013 WL 1435223, at *2 (N.D. Cal. Apr. 9, 2013) ("There may
7	be 'good cause' to seal records that are privileged, contain trade secrets, contain confidential research,
8	development or commercial information, or if disclosure of the information might harm a litigant's
9	competitive standing.").
10	5. Exhibits A and B contain confidential information regarding Google's highly sensitive
11	financial and product revenue data, metrics data, internal lifetime value analyses, and costs
12	information, as well as figures from which a competitor could deduce Google's highly sensitive
13	financial and product revenue data. Public disclosure of this information would harm Google's
14	competitive standing and create a risk of injury by providing competitors with access to information
15	that Google does not have similar access to about their competitors, allowing them to gain a
16	competitive advantage in the marketplace. If such information were made public, I understand that
17	Google's competitive standing would be significantly harmed. Google has therefore designated this
18	information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY under the protective order
19	(Dkt. 92). I also understand that this Court has previously granted sealing of the same and/or similar
20	information. See, e.g., Dkt. 334 at 4.
21	I declare under penalty of perjury under the laws of the United States of America that to the
22	best of my knowledge the foregoing is true and correct. Executed on May 19, 2023, in San Francisco,
23	California.

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DATED: May 19, 2023

By: /s/ Jocelyn Ma
Jocelyn Ma